REMARKS

With respect to the question in paragraph 2, it is correct that bridging elements 14 in the specification would be an example of spokes as described in claims 34-38.

Claim 34 was rejected as anticipated by Lee. However, Lee does not show the stencil that forms the solder mask 200. Certainly, a solder mask cannot constitute a stencil itself because a solder mask is formed integrally onto the semiconductor device. It is not a stencil "for depositing material in the manufacture of the semiconductor device" as set forth in claim 34. All that the solder mask does is prevent solder from running to areas it was not intended to go to. It does not act as a stencil in any way. Moreover, the solder mask is part of the integrated circuit and is not positioned over it for deposition and then removed, as set forth in the amended claims.

Of course, the solder mask may have been applied by a device that might be defined as a stencil. We do not know. However, plainly, whatever device was used to put down the solder mask 200, as shown in the Figures, it cannot meet the claim limitations because the items 100, which are alleged to be spokes, are not part of any stencil used to put down the solder mask 200 and, moreover, are not even part of the solder mask 200. They are the underlying structure of the integrated circuit as clearly shown in Figure 6B. Thus, the elements 100 are not part of the solder mask 200. Therefore, they cannot be relevant to the claim 34. The solder mask 200 is not a stencil and, therefore, it cannot be relevant to the claim 34.

In view of these remarks, reconsideration of the rejection of claim 34 under Lee is respectfully requested.

Claim 34 was also, again, rejected under Section 102(b) as anticipated by Natarajan.

However, again, Natarajan teaches a solder mask, not the stencil that is used to form the solder mask, if any. The solder mask itself does not constitute a stencil and does not constitute a stencil "for depositing material on the semiconductor device before removing the stencil from over the device" as set forth in amended claim 34. It does not provide a stencil for depositing because all it does is keep solder, used to secure parts together, from running over the stencil mask area. Specifically, as shown in Figure 7, the solder mask 32 can apparently be seen to the left and the right of the solder ball 36. The solder mask 32 prevents the solder from running beyond the opening in the solder mask. Thus, there is no way that it can be a stencil and no way is it teaching of a method of making a stencil for depositing a material.

Again, a stencil might have been used to form the solder mask 32, but we do not know if that is so. However, if a stencil was used to form the solder mask, it has the inverse of the structure claimed. Namely, it must have raised portions where the openings 34 are defined and lower portions where the elements 26 are defined. Therefore, it cannot meet the claimed limitations.

In view of these remarks, reconsideration is respectfully requested.

Respectfully submitted,

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